

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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UNITED STATES OF AMERICA)
v.)
OSCAR PATINO, a/k/a OSCAR)
PATINO-BUENO, and CLAUDIA)
NAVARRO, a/k/a CLAUDIA)
NAVARRO-MONTERO)
CRIMINAL NO.
03-10331 - RGS

**DEFENDANT OSCAR PATINO'S MOTION TO MODIFY THE
CONDITIONS OF HIS PRETRIAL RELEASE
TO PERMIT HIM TO WORK**

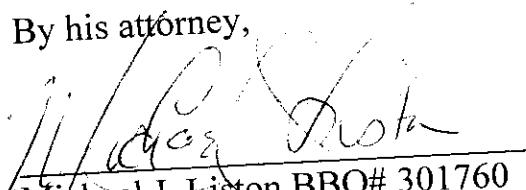
The defendant Oscar Patino ("Patino") is currently on release under the following conditions: (1) he is electronically monitored full time under "standard" conditions, (2) he must maintain his residence at 310 Skyline Drive, #12, Dracut, Massachusetts, (3) his travel is restricted to Massachusetts, (4) he is not to use or possess firearms or destructive devices, (5) he is not to possess or use any illegal narcotics, (6) he is prohibited from the excessive use of alcohol, (7) he has surrendered his passports and he must not apply for another one, and (8) he must notify Pretrial Services within 24 hours of any arrest.

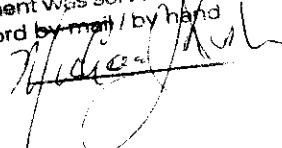
Patino has been on release since August 7, 2003, and in a letter dated January 12, 2004, Pretrial Services reported to the court that Patino has been in full compliance with all the conditions of his release.

Because Patino has been subject to "standard" electronic monitoring conditions, he has not been able to leave his residence for work. Patino must work in order to support himself while on release. Patino has been offered full time employment, on a commission basis, as an advertising sales person for the Merrimack Journal, Inc. The Merrimack Journal is distributed into thirteen communities in Eastern Massachusetts and Southern New Hampshire. In order for Patino to accept this employment, the conditions of his release must be modified to permit him to leave his residence and to travel in New Hampshire as well as in Massachusetts for the purpose of selling newspaper advertising.

Patino moves that the conditions of his release be modified so that (1) he may travel on business in New Hampshire as well as in Massachusetts and (2) he be permitted to leave his residence during the hours of 8:00 a.m. and 7:00 p.m. Monday through Friday and 8:00 a.m. and 2:00 p.m. on Saturdays for the purpose of selling advertising for the Merrimack Journal. He would otherwise remain on electronic monitoring and be subject to the current conditions of his release. As an additional condition, suggested by Pretrial Services, Patino would provide proof of employment to Pretrial Services on a regular basis.

By his attorney,


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CERTIFICATE OF SERVICE
 I hereby certify that on this day a true copy of this document was served upon all counsel of record by mail / by hand
 Date: 1-15-04 

Dated: January 15, 2004